

State Water Resources Control Board

January 5, 2016

(Via email and Certified Mail)

CERTIFIED MAIL

NO. 7015 1520 0001 8019 5685

Mr. Joseph Olson
Environmental Engineer
VA Greater Los Angeles Healthcare System
11301 Wilshire Boulevard (130E)
Bldg. 218 Room 310
Los Angeles, California 90073
joseph.olson@va.gov

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT WEST LOS ANGELES VETERAN'S ADMINISTRATION GLAHS,
11301 WILSHIRE BOULEVARD, LOS ANGELES**

Dear Mr. Olson:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on December 3, 2015, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and title 23, California Code of Regulations (CCR), chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Operating Permit – The facility permit to operate is expired.	All	December 3, 2015	Ongoing	H&SC 25284(a)
2	Failure to Maintain Tank Forms – The tank information forms in CERS need to be updated to include: correct form of overfill protection, secondary containment piping construction, fill components installed, correct form of corrosion protection, verification of the installation date, and confirmation of a striker plate.	All	December 3, 2015	Ongoing	H&SC 25286(a); 23 CCR 2711(a)
3	Failure to Tag Monitoring Equipment – The current monitoring certification sticker was not affixed to the monitoring panel.	295 Lower	December 3, 2015	Ongoing	23 CCR 2638(f)
4	Failure to Maintain Monitoring Plan – The monitoring plans in	All	December 19, 2015	Ongoing	23 CCR 2711(a)(9)

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

No.	Violation	Tank	Start Date	Stop Date	Regulation
	CERS need to be updated to include: the tank monitoring secondary containment system should be listed as dry for all but tank 304 which is wet; the monitoring panel model and sensor model numbers must be listed; pipe monitoring must be continuous and listed as dry for all tank piping, periodic system testing should say yes to secondary containment testing and yes to spill bucket testing; recordkeeping should say yes to alarm logs, visual inspection records and equipment maintenance and calibration records.				
5	Failure to Monitor Product Piping – Monitoring sensors in the fill sumps are not able to detect a leak at the earliest opportunity because the test boots are on both tank's supply lines and tank 501 South's return line.	295 Lower; 501 South	December 3, 2015	Ongoing	23 CCR 2630(d)
6	Failure to Monitor Product Piping – Monitoring sensor in the fill sump is not able to detect a leak at the earliest opportunity because it was raised above the lowest point in the sump and not directly beneath product piping.	304	December 3, 2015	Ongoing	23 CCR 2630(d)
7	Failure to Maintain Secondary Containment – The secondary containment test conducted on September 14, 2011, reported failures that have not been repaired. An additional secondary containment test conducted on September 24, 2014, reported failures to 24 of 27 components.	295 Upper	September 14, 2011	Ongoing	H&SC 25291(a)(2)
8	Failure to Maintain Secondary Containment – The secondary containment test conducted on September 12, 2014, reported failures that have not been repaired.	304	September 12, 2014	Ongoing	H&SC 25291(a)(2)

No.	Violation	Tank	Start Date	Stop Date	Regulation
9	Failure to Maintain Secondary Containment – The secondary containment test conducted on September 24, 2014, reported failures that have not been repaired.	295 Lower	September 24, 2014	Ongoing	H&SC 25291(a)(2)
10	Failure to Maintain Secondary Containment – The secondary containment test conducted on September 24, 2014, reported failures that have not been repaired.	300	September 24, 2014	Ongoing	H&SC 25291(a)(2)
11	Failure to Maintain Secondary Containment – The secondary containment test conducted on January 6, 2012, reported failures that have not been repaired. An additional secondary containment test conducted on December 8, 2014, reported failures that have not been repaired.	501	January 6, 2012	Ongoing	H&SC 25291(a)(2)
12	Failure to Maintain Monitoring or Testing Records Onsite – The 2013 monitoring certifications were not available onsite at the time of inspection.	295 Upper; 300; 304	December 3, 2015	Ongoing	H&SC 25293; 23 CCR 2712(b), 2715(e)
13	Failure to Maintain Spill Containment Requirements – The spill containment devices had liquid and debris inside of them which prevents their ability to hold five gallons.	510 unleaded; 295 Lower	December 3, 2015	Ongoing	23 CCR 2635(b)(1)
14	Failure to Monitor Product Piping – Monitoring sensors were unable to detect a leak at the earliest opportunity because they were not located in the correct position. The sensor location violations were corrected at the time of inspection.	295 Lower; 510 Diesel; 501 South;	December 3, 2015	December 3, 2015	23 CCR 2630(d)
15	Failure to Maintain Release Response Plan Onsite – A response plan was not available at time of inspection.	301	December 3, 2010	Ongoing	23 CCR 2712(i)
16	Failure to Maintain Monitoring Plan Onsite – A monitoring plan was not available at time of inspection.	301	December 3, 2010	Ongoing	23 CCR 2712(i)

No.	Violation	Tank	Start Date	Stop Date	Regulation
17	Failure to Perform Monthly Designated Operator Inspections – There are no records indicating that a designated operator has been conducting monthly inspections for this tank system.	301	December 3, 2010	Ongoing	23 CCR 2715(c)
18	Failure to Monitoring Tank System – Existing tank system is not equipped with a monitoring system capable of detecting an unauthorized release.	301	December 3, 2010	Ongoing	23 CCR 2641(a)
19	Failure to Maintain Maintenance and Testing Records Onsite – Maintenance records for the tank system and annual monitoring certification results were not available at time of inspection.	301	December 3, 2010	Ongoing	H&SC 25293; 23 CCR 2712(b)
20	Failure to Comply with Permanent Closure Requirements – Closure requirements have not been completed for this tank. Tank is filling with water from an unknown source.	301	December 3, 2010	Ongoing	H&SC 25298; 23 CCR 2670(c), 2672

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and the Los Angeles City Fire Department within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Ms. Rebecca Green
UST Enforcement Unit
State Water Resources Control Board
1001 I Street, 16th Floor
Sacramento, California 95814
rebecca.green@waterboards.ca.gov

Local CUPA

Mr. Reynaldo Husband
Fire Inspector
Los Angeles City Fire Department
200 Main Street, Suite 1700
Los Angeles, California 90012
reynaldo.husband@lacity.org

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Amantha Henkel". The signature is fluid and cursive, with the first name "Amantha" and last name "Henkel" clearly legible.

Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Ms. Anna Olekszyk
Los Angeles City Fire Department
anna.olekszyk@lacity.org

Captain Daniel Dragotto
Los Angeles City Fire Department
daniel.dragotto@lacity.org

Mr. Reynaldo Husband
Los Angeles City Fire Department
reynaldo.husband@lacity.org

Mr. Charles Liou
Senior Consultant/Project Manager
Alta Environmental
charles.liou@altaenviron.com